

EXHIBIT A

Firtiva Corporation's P.R. 4-3(a)(2) Claim
Construction Chart of Terms and Support

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

FIRTIVA CORPORATION	§	
	§	
v.	§	Case No. 2:21-CV-0111-JRG-RSP
	§	
FUNIMATION GLOBAL GROUP, LLC	§	

**PLAINTIFF FIRTIVA CORPORATION'S CLAIM CONSTRUCTION CHART OF
TERMS AND SUPPORT PURSUANT TO LOCAL RULE 4-3(a)(2)**

Term¹	Firtiva's Proposal	Firtiva List of Evidence
“A computer implemented method comprising”	Plain and Ordinary Meaning	Intrinsic Evidence ‘999 patent <ul style="list-style-type: none"> • col. 4, ll. 2-8. • claim 5-6, 8, 14, 23, and 30 • claim 6 • col. 4, ll. 21-28. • FIG. 4 • col. 5, ll. 29-41 • FIG. 6 • col. 6, l. 56 – col. 7, l. 4 • col. 6, ll. 5-13
“A computer comprising”		
“A system comprising”		
“receiving an enticement based on the embedded information, the viewing information, user information retrieved based on the user identifier, and a sponsor of	Plain and Ordinary Meaning	Intrinsic Evidence ‘999 patent <ul style="list-style-type: none"> • col. 4, ll. 2-8. • claim 5-6, 8, 14, 23, and 30 • claim 6 • col. 4, ll. 21-28. • FIG. 4 • col. 5, ll. 29-41 • FIG. 6 • col. 6, l. 56 – col. 7, l. 4

¹ All terms herein were proposed for construction by Funimation

<p>the time slice corresponding to the sponsor identification”</p> <p>“the receiver further configured to receive an enticement based [on] the embedded information, the viewing information, user information retrieved based on the user identifier, and a sponsor of the time slice corresponding to the sponsor identification”</p> <p>“transmitting the enticement based on at least one of: the embedded information, the viewing information, the user information, and a sponsor of the broadcast”</p> <p>“transmit the enticement based on at least one of: the embedded information, the viewing information, the user information, and a sponsor of the broadcast”</p>		<ul style="list-style-type: none"> • col. 6, ll. 5-13
<p>“user identifier”</p>	<p>Plain and Ordinary Meaning</p>	<p>Intrinsic Evidence</p> <p>‘999 patent</p> <ul style="list-style-type: none"> • col. 2, ll. 31-32

		<ul style="list-style-type: none"> • col. 2, ll. 37-44 • col. 3, ll. 3-5 • col. 3, ll. 9-16 <p>Extrinsic Evidence</p> <ul style="list-style-type: none"> • Funimation's Privacy policy identified at https://funimation-app.com/privacy (Ex. A to Firtiva's 4-2 disclosures) • Dkt. 1-2 (Ex. B to Complaint) • Sony Privacy policy identified at https://www.sony.com/en_us/SCA/privacypolicy.html (last accessed 9/2/2021) (Ex. B to Firtiva's 4-2 disclosures). • Brightcove Privacy policy identified at https://www.brightcove.com/en/legal/privacy (last accessed 9/2/2021) (Ex. C to Firtiva's 4-2 disclosures). • Freewheel Privacy policy identified at https://www.freewheel.com/privacy-policy (last accessed 9/2/2021) (Ex. D to Firtiva's 4-2 disclosures) • https://www.dictionary.com/browse/user (last accessed 9/2/2021) • https://www.merriamwebster.com/dictionary/user (last accessed 9/2/2021) https://www.dictionary.com/browse/identifier (last accessed 9/2/2021) • Wiley Electrical and Electronics Engineering Dictionary (Ex. E to Firtiva's 4-2 disclosures) • McGraw-Hill Dictionary of Scientific and Technical Terms, Sixth Edition (Ex. F to Firtiva's 4-2 disclosures) • Random House Webster's Unabridged Dictionary, Second Edition (Ex. G to Firtiva's 4-2 disclosures)
“sponsor identification”	Plain and Ordinary Meaning	<p>Intrinsic Evidence</p> <p>‘999 patent</p> <ul style="list-style-type: none"> • Abstract • FIG. 6 • FIG. 8 • col. 2, ll. 7-23 • col. 2, ll. 25-44 • col. 2, ll. 47-62 • col. 2, l. 65 to col. 3, l. 17 • col. 3, ll. 57-60 • col. 4, ll. 2-8

		<ul style="list-style-type: none"> • col. 4, ll. 11-15 • col. 4, ll. 21-28 • col. 4, ll. 40-43 • col. 4, ll. 46-58 • col. 4, ll. 61-65 • col. 5, ll. 4-10 • col. 5, ll. 15-25 • col. 5, ll. 29-41 • col. 5, ll. 42-55 • col. 6, ll. 1-4 • col. 6, ll. 5-12 • col. 6, ll. 55-67 • col. 7, ll. 1-13 • FIRTIVA_000084 <p>Extrinsic Evidence</p> <ul style="list-style-type: none"> • Ex. E to Firtiva 4-2 disclosures • Ex. F to Firtiva 4-2 disclosures • Ex. G to Firtiva 4-2 disclosures • https://www.dictionary.com/browse/sponsor (last accessed 9/2/2021)
“user information”	Plain and Ordinary Meaning Not invalid under 35 U.S.C. §112	<p>Intrinsic Evidence</p> ‘999 patent <ul style="list-style-type: none"> • col. 2, ll. 6-13 • col. 2, ll. 24-30 • col. 2, ll. 37-40 • col. 2, ll. 45-53 • col. 2, l. 63-col. 3, l. 3. • col. 3, ll. 5-16 • col. 3, l. 56 to col. 4, l. 8 • col. 4, ll. 11-27 • col. 4, ll. 39-51 • col. 4, ll. 52-58 • col. 4, l. 61 to col. 5, l. 10 • col. 5, ll. 36-41 • col. 6, ll. 51-60 • FIRTIVA_0000089-90 • FIRTIVA_0000101-102 • FIRTIVA_104-105 • FIRTIVA_0000108-109 • FIRTIVA_0000111-112 • FIRTIVA_0000115-118 • FIRTIVA_0000135 • FIRTIVA_0000175 • FIRTIVA_178-179

		<ul style="list-style-type: none"> • FIRTIVA_0000181-183, 185-186 • FIRTIVA_0000189 • FIRTIVA_0000204 • FIRTIVA_0000265 <p>Extrinsic Evidence</p> <ul style="list-style-type: none"> • PR 4-2(b) Declaration of Dr. Tal Lavian, dated September 24, 2021 • Ex. A to Firtiva 4-2 disclosures • Dkt. 1-2 • Ex. B to Firtiva 4-2 disclosures • Ex. C to Firtiva 4-2 disclosures • Ex. D to Firtiva 4-2 disclosures • https://www.dictionary.com/browse/information (last accessed 9/2/2021) • https://www.dictionary.com/browse/user (last accessed 9/2/2021) • https://www.merriam-webster.com/dictionary/user (last accessed 9/2/2021) • Ex. E to Firtiva 4-2 disclosures • Ex. F to Firtiva 4-2 disclosures • Ex. G to Firtiva 4-2 disclosures • US Patent No. 7,003,792 • US Patent No. 5,796,952 • US Pub. No. 2003/0135853 • US Patent No. 5,974,451 • US Patent No. 8,271,487 • US Patent No. 7,496,947 • US Pub. No. 2007/0072676 • US Pub. No. 2002/0152117 • US Pub. No. 2002/0169540
“time slice”	Plain and Ordinary Meaning	<p>Intrinsic Evidence</p> <p>‘999 patent</p> <ul style="list-style-type: none"> • FIG. 4 • col. 5, ll. 29-41 • FIG. 6 • col. 6, l. 56 – col. 7, l. 4 • col. 6, ll. 27-39 • col. 6, ll. 40-48 • FIRTIVA_0000084-85, 87, 89-90 <p>Extrinsic Evidence</p> <p>Ex. G to Firtiva 4-2 disclosures</p>
“end-of-slice marker that signals the end of a time	Plain and Ordinary Meaning	<p>Intrinsic Evidence</p> <p>‘999 patent</p> <ul style="list-style-type: none"> • FIG. 4

slice”		<ul style="list-style-type: none"> • col. 5, ll. 29-41 • FIG. 6 • col. 6, l. 56 – col. 7, l. 4 • col. 6, ll. 27-39 • col. 6, ll. 40-48 • FIRTIVA_0000084-85, 87, 89-90 <p>Extrinsic Evidence Ex. G to Firtiva 4-2 disclosures</p>
“enticement”	Plain and Ordinary Meaning	<p>Intrinsic Evidence ‘999 patent</p> <ul style="list-style-type: none"> • Abstract • col. 2, ll. 2-4 • col. 2, ll. 20-23 • col. 2, ll. 40-44 • col. 2, ll. 59-62 • col. 3, ll. 13-16 • col. 4, ll. 2-8 • col. 4, ll. 20-28 • col. 4, ll. 52-58 • col. 5, ll. 4-10 <p>Extrinsic Evidence https://www.merriam-webster.com/thesaurus/enticement (last accessed 9/2/2021)</p>
“the data comprising at least one of a TV channel, content name, timestamp, time slice, and sponsor identification”	Plain and Ordinary Meaning	<p>Intrinsic Evidence ‘999 patent</p> <ul style="list-style-type: none"> • FIG. 4 • col. 5, ll. 29-41